

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

(1) BRYAN SAMS,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 24-cv-00602-SH
)	
(1) JOHNSON MATTHEY, INC., d/b/a)	Removed from Tulsa County
TRACERCO, a foreign corporation,)	Case No. CJ-2024-4271
(2) THE UNIVERSITY OF TULSA, a not-for-)	
profit Oklahoma Corporation,)	
(3) CHEVRON USA, INC., a foreign corporation)	
(4) CHASE ENVIRONMENTAL GROUP, INC.)	
a foreign corporation,)	
(5) CHINA INSTITUTE OF ATOMIC ENERGY)	
a foreign corporation,)	
)	
Defendants.)	

**DEFENDANTS' SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO
ANSWER, MOVE AGAINST, OR OTHERWISE RESPOND TO PLAINTIFF'S
PETITION**

Defendants Johnson Matthey Inc. d/b/a Tracerco ("Tracerco"), the University of Tulsa ("TU"), Chevron USA, Inc. ("Chevron"), and Chase Environmental Group, Inc. ("Chase") (collectively, Defendants) jointly move under Federal Rule of Civil Procedure 7(b) and LCvR7-1(g) for an extension of 21 days or until February 24, 2025 to answer, move against, or otherwise respond to Plaintiff's Petition. In support of this Second Unopposed Motion, Defendants state as follows:

1. Plaintiff filed his Petition in District Court of Tulsa County, State of Oklahoma on November 12, 2024. (ECF No. 2-2).
2. Tracerco timely removed this action from District Court of Tulsa County, State of Oklahoma to this Court on December 11, 2024. (ECF No. 2).

3. Currently served Defendants moved for an extension of time to answer or otherwise respond to Plaintiff's Petition on December 17, 2024. (ECF No. 10).

4. The Court granted Defendants' Motion, allowing them until February 3, 2025, to file an answer or otherwise respond to Plaintiff's Petition. (ECF No. 13).

5. The parties have been in early settlement talks and are continuing to obtain documents to review and investigate Plaintiff's claims. As such, they seek a second extension of time until February 24, 2025.

6. This second request for an extension of time is sought in good faith and not for the purpose of delay. This action is not presently set for trial, and no scheduling order has been entered; thus, granting this motion will not delay or adversely affect the trial date or any deadlines.

7. The undersigned counsel contacted Plaintiff's counsel regarding this request. Plaintiff's counsel advised that the undersigned may indicate that Plaintiff does not oppose Defendants' requested 21 day extension.

8. A proposed order is being submitted simultaneously to the Court for consideration under LCvR7-1 (g).

Defendants respectfully request that the Court issue an Order extending the time for all currently served Defendants—Tracerco, TU, Chevron, and Chase—to respond to Plaintiff's Petition by motion, answer, or other responsive filing until February 24, 2025.

Respectfully submitted this 30th day of January 2025.

**DOERNER, SAUNDERS, DANIEL
& ANDERSON, L.L.P.**

By: s/Michael S. Linscott

Michael S. Linscott, OBA No. 17266

Two West Second Street, Suite 700

Tulsa, OK 74103-3117

Telephone 918.591.5288

Facsimile 918.925.5288

Email: mlinscott@dsda.com

and

Kaylee Patricia Davis-Maddy

DOERNER, SAUNDERS, DANIEL & ANDERSON,

LLP

210 Park Avenue STE 1200

Oklahoma City, OK 73102

P: (918-591-5242

F: 918-925-5242

kmaddy@dsda.com

***Attorneys for Johnson Matthey Inc., d/b/a
Tracerco***

WRITTEN CONSENT OF OTHER SERVED DEFENDANTS:

Chase Environmental Group, Inc.

s/Robert Betts

Robert Betts, OBA No. 21601
**PIERCE COUCH HENDRICKSON
BAYSINGER & GREEN, LLP**
Post Office Box 26350
Oklahoma City, Oklahoma 73126-0350
(405) 235-1611 – *Telephone*
(405) 235-2904 – *Facsimile*
rbetts@piercecouch.com

-and-

Mark E. Hardin, OBA No. 15297
**PIERCE COUCH HENDRICKSON
BAYSINGER & GREEN, LLP**
Post Office Box 239
Tulsa, Oklahoma 74101
Tel. (918) 583-8100
Fax (918) 583-8017
E-mail: mhardin@piercecouch.com

Consent to removal on behalf of:
Chevron USA, Inc.

s/Mary Quinn Cooper

Mary Quinn Cooper, OBA No. 11966
MCAFEE & TAFT, PC
Two West Second Street, Suite 1100
Tulsa, Oklahoma 74103
(918) 587-0000 – *Telephone*
(918) 599-9317 – *Facsimile*
maryquinncooper@mcafeetaft.com

-and-

Mary Rose Alexander (*pro hac vice*)
LATHAM & WATKINS LLP
330 North Wabash Avenue, Suite 2800
Chicago, IL 60611
(312) 876-7700 – *Telephone*
(312) 993-9767 – *Facsimile*
Mary.rose.alexander@lw.com

Consent to removal on behalf of:
The University of Tulsa

s/Ryan A. Ray
Ryan A Ray, OBA No. 22281
NORMAN WOHLGEMUTH, LLP
3200 Mid-Continent Tower
401 South Boston Ave
Tulsa, Oklahoma 74103
(918) 583-7571 – *Telephone*
(918) 584-7846 – *Facsimile*
RRay@nwlawok.com

CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2025, I electronically transmitted the foregoing document to the Court Clerk using the ECF System for filing. The Court Clerk will transmit a Notice of Electronic Filing to the following ECF registrants:

Charles C McCaskey charles@creekcountylaw.com

G. Gene Thompson gene@creekcountylaw.com, gthompsonlaw@gmail.com

s/Michael S. Linscott